Denise Buckley

From:	Denise Buckley
Sent:	Thursday, July 27, 2017 11:44 AM
To:	'Leo Glickman'
Subject:	RE: Mousseau
Attachments:	RE: Burks depos

Leo,

That's not correct. I spoke with you on July 17th and e-mailed you later that same morning about setting up Supt. Racette's deposition for August 1st. See attached. You voiced no objection to proceeding with Supt Racette's depositon on August 1st until today.

I understand from speaking with you this morning that you are available on August 1st, but you are nevertheless objecting to Supt. Racette's deposition proceeding despite the fact that Supt. Racette has no availability in September and he made special arrangements to make himself available in Albany on August 1st.

Please let me know if you will reconsider your position so that I may avoid having to write to the court.

Best regards,

Denise Buckley | Assistant Attorney General
Litigation Bureau
NYS Office of the Attorney General
State Capitol | Albany, NY 12224
Tel: (518) 776-2294 | Fax: (518) 915-7738 | denise.buckley@ag.ny.gov

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From: Leo Glickman [mailto:lglickman@stollglickman.com]
Sent: Thursday, July 27, 2017 11:13 AM
To: Denise Buckley <Denise.Buckley@ag.ny.gov>
Subject: FW: Mousseau

This was the first time you confirmed Racette's availability. Two days ago. I responded to you the next day.

From: Denise Buckley [mailto:Denise.Buckley@ag.ny.gov]
Sent: Tuesday, July 25, 2017 4:09 PM
To: Leo Glickman <lglickman@stollglickman.com>
Cc: Pepper, Joshua (DOCCS) <Joshua.Pepper@doccs.ny.gov>
Subject: RE: Mousseau

Leo,

The attachment did not come through. Please try re-sending it.

Your e-mail below is the first notice I received of Investigator Mousseau's deposition. After receiving it, I spoke with Josh Pepper at DOCCS' Counsel's office (copied to this e-mail). Please contact Josh (tel 518-457-4951) to discuss

Investigator Mousseau's deposition. I understand from speaking with Josh that he and another colleague from DOCCS' Counsel's office have left you messages advising that this Friday is not suitable, but Thursday would suit. Please contact Josh directly to discuss and try to agree suitable arrangements. I can't set up Investigator Mousseau's deposition, but I would like to attend, so I would be grateful if you would schedule it so that it does not coincide with the party depositions in this matter.

Officer Nolan's deposition is taking place in this matter on Friday at 1pm at 90 State Street in Albany. Retired Supt Racette's deposition is scheduled to take place on August 1st at 1pm in Albany. Officer Chamberlain is available for deposition on August 3rd at 1pm.   I don't recall if you confirmed the Chamberlain deposition, but that was one of the dates you mentioned you were available. Presumably these depositions will be at 90 State Street again? Please confirm.

Best regards,

Denise Buckley | Assistant Attorney General
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From: Leo Glickman [mailto:lglickman@stollglickman.com]
Sent: Tuesday, July 25, 2017 3:32 PM
To: Denise Buckley <Denise.Buckley@ag.ny.gov>
Subject: Mousseau

We successfully served the subpoena on shawn mousseau on Monday, July 17. See attached. Have you been contacted by him? Will you be representing him? I will have an attorney in Kingston, NY at 11 am to depose him on Friday. If you would want to make some other arrangement, please let me know by end of day today.

Leo Glickman
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